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June 30, 2021

Hon. Peggy Kuo, U.S.M.J. U.S. District Court, E.D.N.Y. 225 Cadman Plaza East Brooklyn, NY 11201

Re: Novagold Resources Inc. v. J Capital Research USA LLC, No. 20-cv-02875-LDH-PK Request for Oral Argument on Defendant's Opposition to Plaintiff's Motion To Compel and on Defendant's Cross-Motion for a Protective Order

Dear Judge Kuo:

On behalf of Defendant J Capital Research USA LLC, we write to request that the Court order oral argument on Defendant's Opposition to Plaintiff's Motion To Compel (Dkt. 56) and on Defendant's Cross-Motion for a Protective Order (Dkt. 60) pursuant to Your Honor's Individual Practice Rule VI(D) as soon as counsel can be heard.

Respectfully,

/s/David S. Korzenik David S. Korzenik